

FY '11 Rd 2 Emergency Solutions Grant (ESG) Questions and Answers & Comments and Replies

The U.S. Department of Housing and Urban Development (HUD) is providing **one-time funding, Rd 2 FY '11 ESG**, to assist communities in addressing the housing needs of those who are either homeless or at risk. This funding requires a 100% match, which MSHDA has offered to provide. The policy being implemented in this one-time funded program is specifically based upon federal requirements. MSHDA was required to amend its FY '11 Consolidated Plan in order to qualify for receipt of the funding. As required, MSHDA provided notice to the public that the Consolidated Plan was being amended and proposed changes to the Plan were placed on MSHDA's web-site. MSHDA received two comments from the public, both of which were addressed when the final Consolidated Plan was forwarded to HUD. MSHDA is required to follow the program as outlined in the Consolidated Plan and as stated within HUD's regulations.

MSHDA is providing the 1:1 cash match required by HUD and is keeping zero administrative fees as we understand the stress that service providers face assisting the large number of people in need within your communities.

| QUESTION | ANSWER |
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| CASE MANAGEMENT | |
| 1. On page 5 it talks about a minimum 15% of the grant to be assigned to Prevention and a minimum 75% assigned to Rapid rehousing for a total of 90% of the total grant...that leaves 10% for case management...what happens to the HMIS data entry and Administrative?...that combined 10% (7% + 3%) would put us over 100% of the grant. | Out of the 90% allocated to Prevention and Rapid Re-housing, 20% can be used for case management activities . Along with 20% of financial assistance going to case management, 3% is allowed for HMIS and 7% for administration. Note that although allowed to keep administrative fees, MSHDA passes all the funds to our sub-grantees; MSHDA keeps zero percent (0%), of this grant. In addition, MSHDA is meeting the 1:1 match requirement. |
| 2. On page 6 it states, "If the participant does not attend [case management sessions] the agency can terminate assistance." This statement is contradicted on page 17 under Participating in Support Services, that, "support services cannot be mandated for individual(s) receiving ESG assistance." Which statement should the HARA follow? | If the participant does not attend monthly case management meeting, i.e., a monthly check in, he/she can be terminated. It doesn't say must be terminated. Federal policy states, this should be only in extreme cases, and the termination process must include 1) written notice; 2) Review of decision in which the participant can document any objections, 3) final notice. Termination does not bar the participant from future services. However, a participant cannot be mandated to participate in a service program. |
| 3. Page seven, "Individual(s) receiving TBRA or HCV (all known as rental assistance) may receive case management services (such as credit repair/mediation and housing search/placement) if they meet ESG eligibility criteria and without case management they would become homeless; | No written documentation is needed. Ask the client if he/she is receiving TBRA or HCV. This simply means that if a household is seeking case management services, that you can use ESG case management funds to provide it. However, the client cannot receive rental or utility assistance while on TBRA or HCV. |

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| they cannot receive ESG funds for Prevention assistance.” What documentation will be sufficient in order “prove” the client is not receiving these services? | |
| 4. For prevention and rapid rehousing money, there are new "target populations". If we are to prioritize funds, does that mean we only approve clients who meet these categories such as: chronically homeless, homeless with a disability? | Work to provide rental assistance to those homeless with a disability and chronically homeless first, as they are the hardest to serve and may not remain housed without providing rental assistance. Note, this does not mean that you cannot assist the general homeless population with rental assistance. Always provide subsidy based upon “progressive engagement”, giving just enough money to help folks get through their crisis. |
| INCOME/FORMS | |
| 5. Can clients "self-declare" a disability? For example, a client that does not receive disability income but claims he is bi-polar. | No, ESG Form No. 4 must be completed; the required documentation is specified on the form. As stated on the form, <u>oral-third party and self-certification are not appropriate.</u> |
| 6. Calculating income: I've been asked if we can take into consideration a garnishment or court ordered monthly fines. Is that the case, or can we only use the gross amount? | The full amount, before any payroll deductions, of wages and salaries etc. is used to calculate gross household income; therefore, garnishments are included in the income calculation. |
| 7. While this could be an incredible opportunity for our communities, we have several concerns about how to make it work in a very rural setting. Why have all of the HPRP forms, some quite redundant, been added to the ESG program? While we completely understand the need to ensure people qualify for the assistance, we have always been very diligent in getting third party verification of all information. The sheer number of forms to fill out with clients, 18 forms not counting HMIS forms or our own, will greatly hinder the number of client who can be seen in a day. | The 18 forms are not required for all cases. MSHDA created these forms to ensure that ESG activities were carried out in compliance with the new federal regulations within the HEARTH Act, and in doing so, this statewide implementation generates a significant cost savings to service providers through the state given local communities did not have to carry the burden of creating the required new forms. |
| 8. The 30% AMI qualification seems too low. Originally, our community was at 50% AMI, which seemed reasonable. The transition to 40% was difficult and lowering it again to 30% will present even more of a challenge. We see people every day at 40-50% AMI who definitely need the assistance. | HUD regulation requires incomes to be below 30% AMI. |
| 9. Will there be webinars or podcasts that cover the additional paperwork requirements? | Yes. MSHDA will provide notice to the CoC Chairs and HARAs. |
| 10. If the client has already been through asset testing through the Department of Human Services, why is this necessary for the HARA to duplicate this process? Can we clarify and establish automatic qualification criteria? | HUD requires file documentation. At this time, MSHDA and DHS do not have a method of sharing information. If the client brings DHS documentation, agencies can use it in the client file. |

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| <p>11. Pages 12-13, The requirements for determining whether a family is eligible for assistance, and the amount of rent the family pays each month, requires intake staff to project or estimate the annual income the household expects to receive. Generally, current circumstances must be used to anticipate income and annual income is projected by annualizing current income. Convert all income to an annual figure by multiplying the pay rate by the frequency of payment:</p> <ul style="list-style-type: none"> • Multiply hourly wages by the number of hours worked per year. Full-time employment (40 hours a week and no overtime) is 2,080 hours (40 hrs. X 52 weeks = 2080 hours). (10 hours a week X 52 weeks = 520 hrs. per year). • Multiply weekly wages by 52. • Multiply bi-weekly wages by 26. • Multiply semi-monthly wages by 24. • Multiply monthly wages by 12. • Multiply daily wages by 260 (full time/no overtime). • To convert monthly amount to weekly, divide by 4.3. • Round up to the nearest dollar at .50 and above (except SS payments, which are always rounded down). • Unemployment compensation should be calculated assuming current circumstances will last a full 12 months. If changes occur later in the year, an interim recertification can be conducted to change the family's rent. How far back do we need to provide documentation of income, one pay stub? One month's worth of pay stubs? How do we account for situations where there may be extenuating circumstances (i.e., a reduction in hours for a portion of the previous year)? Please provide more guidance as to what you will consider ample documentation of household income. | <p>Documents provided by the family must be dated within 60 days of the date of request. For verification of earned income, client must provide pay stubs covering the 2 most recent consecutive pay periods prior to the date of request. Current circumstances must be used to anticipate income for the coming year; if income is reduced during the coming year, client would then bring in pay stubs (showing the reduction in income) and income would be recalculated based on the reduced amount.</p> |
| HMIS ENTRY | |
| <p>12. With only 3% of the grant to pay for HMIS but massive HMIS data entry how is this to be funded? Are other grants available for data entry?</p> <ul style="list-style-type: none"> ○ See page 5 HMIS/Data Collection and Evaluation, | <p>The HARA Workflow has not changed. Not every client will have to be entered into HMIS. Only those clients who are homeless or imminently at risk of homelessness (rental arrearages with an eviction notice) are required to be entered into HMIS. Step#3 of</p> |

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| also page 5 Financial Assistance “An initial consultation with a Housing Resource Specialist to determine need must be held and documented on the HMIS and in the client’s file” | the HARA Workflow Guidebooks states HMIS is required when the Housing Plan is completed for the client. Once it is determined that financial assistance will be provided (rehousing or imminently at risk of homelessness, rental arrearages with an eviction notice <u>data entry</u> is required. Note: HMIS data entry is optional for pre-screening of a client (Step #1) and the screening assessment is done to determine the type of assistance the client needs (Step #2) of the HARA Workflow Guidebook. |
| 13. It looks like Call Point, in HMIS, is now a requirement according to Financial Assistance; how is this to be funded as we are looking at around 1000 calls every quarter for our four counties? a. Page 5 under Financial Assistance “An initial consultation with the Housing Resource Specialist to determine need must be held and documented on the HMIS and in the clients file.” | The HARA Workflow has not changed. Not every client will have to be entered into HMIS. Only those clients who are homeless or imminently at risk or homelessness-rental arrearages with an eviction notice are required to be entered into HMIS. This is when the Housing Plan is done. Step#3 of the HARA Workflow Guidebooks states once it is determined that financial assistance will be provided: rehousing or rental arrearages (eviction notice) data entry is required. Note: HMIS data entry is optional for pre-screening of a client (Step #1) and the screening assessment is done to determine the type of assistance the client needs (Step #2) of the HARA Workflow Guidebook. |
| ELIGIBILITY | |
| 14. Page 25 – Security deposits are listed under both Prevention and Rapid Re-housing. Is that correct? | Yes – security deposits are allowed under prevent if it allows a household to prevention homelessness. Security deposits are also allowed under rapid re-housing, i.e. to provide a deposit and up to six months of rental assistance. |
| 15. Security Deposits are listed under Prevention as well as Re-housing which is very confusing. If someone is already renting, why would we pay a security deposit? | Security is under both categories because it can be used without providing rental assistance or it can be used in conjunction with rental assistance. Sometimes a client who is at imminent risk of becoming homeless needs assistance with a security deposit to prevent him/her from becoming homeless. |
| HABITABILITY | |
| 16. Habitability inspection sheet states under #1 “Structure and Materials: The structure <u>must</u> be structurally sound so as not to pose <u>any</u> threat to health and safety of the occupants and so as to protect the residents from hazards.” o While this is a wonderful ideal, we are not able to look | Prior to the HEARTH Act, HUD did not require inspections for the use of ESG dollars. With the HEARTH Act, HUD is requiring that a Habitability inspection be completed. Follow and complete the Habitability checklist. You do not have to remove walls to search for mold. Run the water and if it is clear, without odor, it is |

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| <p>behind walls for mold or other issues with the structure or to crawl under a house to inspect it.</p> <ul style="list-style-type: none"> ○ #5 states “The Water supply must be free from contamination”. How are we to test this? ○ This form seems very subjective compared to the HQS inspections that we have always done and are trained in. Why would we not continue with what is working and what supports the client, if they do get an HCV voucher, so that they do not have to move again. | <p>most likely acceptable. MSHDA did not require Housing Quality Standards because short-term leasing assistance is provided, up to six months maximum, and because of the burden HQS and repairs puts on administering agencies. Note that a lead based paint inspection is required if the unit was built prior to 1978 and the household has a child under age six.</p> <p>In addition, if a CoC chooses to do HQS inspections versus Habitability, that is acceptable as it is a more stringent inspection.</p> |
| <p>17. We have concerns with regard to the Habitability Standards Inspection; how is the HARA to <u>pay for</u> water testing and lead based paint testing by a Certified Lead Based Paint Risk Assessor? Also, how is it possible to <u>guarantee</u> the health and safety risks of the housing with a visual inspection?</p> | <p>The landlord is responsible for lead-based paint testing and remediation. (This applies to units built prior to 1978 who have a child (ren) age 6 or under. The County Health Department water does free testing. By doing a habitability inspection, agencies are meeting HUD program requirements, performing due diligence to ensure safe housing.</p> |
| <p>18. Please clarify Habitability Inspection. This seems different from HQS Inspection. Who is qualified to do this inspection? Will there be training other than HQS to cover "habitability?"</p> | <p>A ‘Habitability Inspection’ is ‘walk-thru’ assessment of a unit’s accessibility, sanitation, security, illumination, electric and fire safety of a unit. No training is provided. Habitability Standards are different from the Housing Quality Standards (HQS) used for other HUD programs. Because the HQS criteria are more stringent than the habitability standards, a grantee could use either standard. In contrast to HQS inspections, the habitability standard does not require a certified inspector. For more information on HUD Habitability Inspections, go to www.hud.gov and type in habitability inspections.</p> |
| OTHER | |
| <p>19. See MSHDA notes that those living in condemned property are considered homeless and can access ESG if guidelines are met along with proof of condemnation. Based on previous experiences with some communities in HPRP, we have worked with households that were in substandard housing that should have been condemned but were unable to get proper documentation from the local municipality despite deplorable living conditions. In situations such as these, while they may be rare, would there be room for other alternative forms of documentation (perhaps to include failed HQS by a certified staff, or photos documenting the living situation) that could be utilized? (Page 7)</p> | <p>Contact your MSHDA Homeless Assistance Specialist if this situation occurs.</p> |

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| 20. The HARA will be required to keep a copy of intake, assessment, and housing plans for each client who calls and is homeless. How should we pay for the storage of potentially 2,000+ files per year, for up to seven years? | HUD requires files to be maintained for four years. Storage cost could come out of ESG Administrative Fees. |
| 21. According to the policies and procedures on page 18, every client that is not able to receive financial assistance must receive written notification as to why they did not qualify. Who is going to pay for this massive amount of postage? | When the client is in your office, please provide them with a written note and keep a copy for the file. E-mail can be used as well with a copy in the client's file. Mailing/postage should be used only as needed and funds come out of Administrative Fees. |
| 22. What will happen if our HARA chooses not to take on the new funding? Will there be additional penalties from MSHDA associated with this course of action? | This and future ESG funding is based on federal HEARTH Act policy. Funding amounts are based on the census poverty data and HMIS homeless information within a county. If a HARA chooses not to accept the state/federal ESG, this action will not affect future funding offers made based upon census and homeless data. |

| GENERAL COMMENTS | |
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| <p>1. Our Continuum held an emergency meeting to discuss these changes in the ESG. Our main concerns revolve around the idea of what our communities would look like without a HARA. Many of the agencies present expressed fear that a majority of their clients would be left homeless without this type of assistance. Over the past few years we have had discussions about trying to reduce the "tent city" that occurs in the forests and parks in our rural areas, and without continued MSHDA support of the HARA's goals, this will be impossible. Our 10-Year Plan to End Homelessness will undoubtedly fail.</p> <p>Our Continuum cannot in good conscience ask for our HARA to take this grant on when the parameters of the funding could put their agency in jeopardy. We urge you to revisit the Round 2 allocation and make the necessary changes so that our rural communities can continue to serve its homeless population.</p> | Round 2 ESG is HUD's response to the depletion of Homeless Prevention and Rapid Re-Housing dollars. As with HPRP, the funds are largely limited to prevention, re-housing, and case management. Along with limited use of the funds, the new HEARTH Act requires a central intake, HARA. By providing the funds directly to the HARA, more dollars will reach consumers. Note that the regular fall 2012-2013 ESG Notification of Funding will allow the local CoC's to sub-grant to other agencies in the amounts of \$10,000+. |
| 2. See Page 1, under Target Population (Form #4 could be a violation of HIPPA laws as we have never been allowed to ask what a disability is but verify that SSI or SSD and so on, | MSHDA has revised Form 4. |

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| <p>are being received and see if there are needs for an accessible unit. We are checking on this. But see following definition taken from HIPPA law "Protected Health Information. The Privacy Rule protects all <i>"individually identifiable health information"</i> held or transmitted by a covered entity or its business associate, in any form or media, whether electronic, paper, or oral. The Privacy Rule calls this information <i>"protected health information (PHI)."</i>"¹²⁾</p> | |
| <p>3. Our County Human Service Coordinating Body has some concerns related to the Draft Policies and Procedures for the FY 2011 Round 2 Emergency Solutions Grant Funds. The policies and procedures drafted have unrealistic expectations for use in rural areas, like ABC County. We are saddened that if there are not changes or corrections made, our area may not be able to apply for these funds, leaving many who are homeless or on the verge of homelessness with little to no resources.</p> <p>Please consider rewriting the expectations of this grant to make it feasible for those agencies working in areas like ours. ABC County depends on ABC Community Action Agency as our Housing Assessment and Resource Agency (HARA) and we hope you would make it possible for them to apply for ESG funds in a fiscally reasonable manner. Ultimately, the grant, written as is, will hurt our residents. We look forward to hearing good news that you have modified this grant to make it applicable and relevant to communities like ours.</p> | <p>MSHDA targeted the funds as required by HUD regulations and approved by HUD in changes to MSHDA's Consolidated Plan.</p> <p>In response to the HARA, MSHDA is requiring that these small grants go to one agency to reduce overhead, allowing more funds to reach those in need. Again, the 2012 fall ESG will allow the CoC to sub-grant \$10,000+.</p> |
| <p>4. Under use of funds, it states "This assistance is not intended to provide long-term support for the program participants," however, much of what is being asked is long term or should be to be done effectively, such as Credit Counseling.</p> | <p>Funding for this offering is limited, and as a result the uses are targeted.</p> |
| <p>5. The massive amount of HMIS data entry for every client calling with only 3% funding to handle this volume of work is overwhelming.</p> | <p>The HARA Workflow has not changed. Hopefully, you still are using the HARA Workflow Guidebook for guidance. The initial screening has five basic questions (Step #1) and you are not required to enter into HMIS. Step #2 is the Screening Assessment which is also optional but is required if it is determine the client is homeless or imminently at risk of homelessness (rental arrearages with an eviction).</p> |

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| | Note: If the Screening Assessment determines that a client needs Utility Arrearages or Security deposit only, it does not have to be entered into HMIS. Make the payment, attach the back-up documentation, and file in a folder). |
| 6. The 18 new forms needed create a burden on case managers and clients as far as scheduling and time spent with each client. Some of the questions asked, such as the disability questions, appear to violate HIPPA laws. After consulting with lawyers, it has been clarified that the HARA can find out <u>if</u> a client has a disability and can accommodate for those disabilities, however, it creates a moral dilemma for the HARA to store this personal medical information in client files. | Form 4 has been revised. |
| 7. The new funding is not intended to provide long term services, but credit counseling and mediation is offered in case management. To be effective these services would need to take place on a long term basis. This will require more clarification on MSHDA's definition of what constitutes credit counseling. Also, who will be paying for this service? | Credit counseling is often offered in communities and applicants needing this service should be referred to an existing program. The \$100 cap on credit counseling and mediation is kept low so that existing services and programs are used as available and to ensure grant funds are used to pay fundamental housing costs, e.g., deposits, rental assistance. |
| 8. There is a safety concern when asking the HARA to require a face-to-face intake and assessment with each client who calls in rural areas. After a phone intake it may be obvious that the client does not qualify for services. With the policies in place, the client would still need to travel to complete the necessary paperwork just to find out they will not be receiving this type of financial assistance. This time spent is unproductive when a housing plan can be discussed over the phone; it assumes the client's time is not valuable. The danger is in how the client will respond when we have now wasted their time, and potentially their resources when it comes to transportation. | If it is ascertained that client does not qualify, a face-to-face intake and assessment is not required. |
| 9. As a continuum, we are concerned about the statements on page 7 that require the HARA to do additional case management for Housing Choice Voucher clients. We had the understanding that the Housing Agents are already paid to provide this service. | Policy on page seven states "...may receive case management if they meet ESG eligibility criteria and without case management they would become homeless..." It does not say that the HARA is required to provide it; it states you may. In addition, Housing Agents are not paid for case management services by MSHDA or any other agency. |
| 10. Domestic violence shelters in our communities receive | Rd 2 ESG allocation is primarily for rental assistance. Those |

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| <p>funding from the ESG. These agencies will also struggle to house those in need of shelter due to the guidelines laid out for the HARA</p> | <p>participants being served have a right to access this assistance through their HARA. The fall ESG will include shelter allocations.</p> |
| <p>11. We have some concern about the timeline and process for the Intake and Assessment outlined on Pages 6-7. It should be recognized that each community and HARA may have differences in their coordinated system of delivery process. For instance, at our organization, our Housing Resource Center provides an in-depth screening to every potential program participant that presents with a housing need or crisis. All callers receive education, links and referrals as their unique needs and situation dictates. During this process, those who may be eligible for ESG services receive a more in-depth intake that could be considered a basic assessment on the spot, whether it is face to face or by phone, dependent on how they present. Because the person often is calling via phone a face-to-face assessment cannot occur at that time. While the program participant is in housing crisis and every attempt is made to meet with the household as soon as possible, two business days could be a very limited time frame. Efforts are made to streamline our process by providing a scheduled appointment at a choice of community locations at the end of the assessment with a detailed list of instructions and needed documentation to proceed provided to each household. It should also be noted that because there is a need for solid documentation to justify eligibility in the program, there is often a lag in when the program participant can compile.</p> | <p>Two business days is the recommended time frame from HARAs to work with the newly presented homeless person to create a housing plan. However, MSHDA understand that heavy workloads and client delay may preclude this from occurring.</p> |
| <p>12. Note that Page 7 states a Housing Plan must be completed for all individuals who receive a housing assessment. In some instances, upon face-to-face assessment, it is determined that the presenting individual or household does not meet the program eligibility requirements, whether they are over income or do not have documentation to support their participation in the program. Therefore we respectfully request that the language be changed to "A Housing Plan must be completed for all individuals who receive a housing assessment and are determined eligible for ESG services."</p> | <p>This change will be made.</p> |

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| <p>13. From the standpoint of one Community Action Agency in the state, a bridge between our state-wide FacsPRO client tracking software system and HMIS is needed. From what I understand, this is do-able, but would require the Michigan Coalition Against Homelessness and DBA (the company that developed and hosts FacsPRO) to share certain technical information. Please forgive my lack of ability to specify the technical process that would need to occur to make this happen; all I know is that it is happening in other states and it would greatly reduce the time spent on data input into HMIS by this HARA.</p> | <p>Community Action Agencies recently implemented FacsPRO to support agency operation. FacsPRO indicated during the sales process that they would support data integration with ServicePoint. Once they have stabilized on the new System, CAA's should direct FacsPRO staff to contact MCAH and we will link them with Bowman to work out the technical specifications. This will require that they contract with both Vendors. All costs related to the integration should be funded by the CAAs that are using FacsPRO. MCAH will be happy to work with CAA's to discuss the framing on this project. Costs will probably vary based on the level of integration they plan.</p> |
| <p>14. We are hesitant to utilize self-certification without other back-up documentation to support this statement, based on previous experience with HPRP and documentation. We urge MSHDA to consider alternative forms of third-party verification that could include letters from shelters indicating they are operating at full capacity and the potential program participant did pursue this resource but was unable to access due to the shelter being full. In situations such as this, we also relied on third-party verification from an outreach team to verify the person's current living situation. Page 9</p> | <p>Depending upon program participant's circumstances, Agencies may elect to utilize self-certification or require alternative forms of third-party verification (i.e., letters from shelters etc.) to document homeless status.</p> |
| <p>15. On to the specifics of the FY '11 Round 2 Emergency Solutions Grant Funds. I would respectfully ask MSHDA to consider raising or eliminating the percentages that are dictated to the local Continuums of Care and, ultimately, the Housing Assistance Resource Agencies. Without control of how these resources are used in our community, the ability for the CoC to come together to develop creative solutions to solve community needs suffers. This is potentially a huge deterrent for community partners to continue their participation in the 10-year plan to end homelessness.</p> | <p>FY Rd 2 is allocated to the HARA because HUD has targeted the funds to Prevention and Rapid Re-housing. The fall '12 round will allow the CoC to determine grantees. If the HARA and fiduciary are different agencies, the grant can be awarded to the fiduciary, but the HARA is the only sub-grantee.</p> |
| <p>16. We need clarification on Page 12 of the document to determine if the participating household will or will not be required to contribute to rent. In the first line on pg. 12 it states "The household is not required to pay toward their monthly rent." However later in the document, also on Page 12, under "Calculating Income" it states "... and the amount of rent family pays each month." We are concerned that if</p> | <p>We agree and will change the policy and procedures to state that the CoC can determine what percent of the household's income is paid toward rent. Tenant rent range from zero to 30% of their household income.</p> |

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| <p>households are not required to pay anything toward monthly rent in one program/funding source, program participants may “shop” around for program funding that is most advantageous. Because a tenant contribution based on income allows for a variance based on the households’ actual income, it allows the program to insure it is affordable. Those with zero income would be fully assisted and able to participate, while those with a little more in terms of resources will be evaluated equitably. Providing a requirement of some rental obligation also provides emphasis on the important aspect of the program participant being responsible for making payments in a timely fashion as well as to prepare them for ongoing self-sufficiency once the financial assistance ends. It has been our practice in other programs to have the program participant/household pay 30% of their adjusted monthly income toward rent, which is consistent with the ongoing programs such as project based vouchers and housing choice vouchers.</p> | |
| <p>17. Requiring Participation in Support Services - Support services cannot be mandated for individual(s) receiving ESG assistance. Households who are income eligible but fail to make effort to find employment, secure income, apply for other rental assistance programs etc. although they demonstrated the ability to sustain housing at the time of entry cannot have their assistance terminated based on this criteria. Participants enter as eligible for three (3) months; they cannot be promised any certain length of assistance (i.e. assistance will be offered/paid month-by-month within the qualifying limits). This stipulation ties the hands of our agency which is focused on self-sufficiency or independent living; not dependency. While agencies should have a process that identifies the criteria that would constitute termination of assistance, the outright prohibition of terminating funding. Also, what constitutes “termination of funding”? If we only commit one month’s rent for an individual – when they are eligible for up to six months – and do not provide any additional funding...is this termination? This seems to open up an unnecessary door for liability on a part of the agency. Further, this does not seem to make sense in relation to the</p> | <p>Agencies providing rental assistance have to re-verify income quarterly. Monthly visits with clients allow the case manager to talk with clients and practice progressive engagement to see if assistance is needed on a monthly basis.</p> |

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| <p>specific objective of the ESG program which, as I understand it, is to ensure that individuals are able to maintain the housing. If a goal is mutually established by the client and our staff member, and there is no evidence of follow through on a part of the client.</p> | |
| <p>18. #6 ESG Waiver of SER Denial Letter - Please check the boxes below that make a person ineligible for SER: -- If the client is currently living with family members or friends (doubled up) at the time of screening then ESG Prevention Assistance may be provided; unless one of the following exists:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Living with others due to a fire that occurred 60 days prior; <input type="checkbox"/> Living with others to escape Domestic Violence. Please provide some clarification regarding this wording. Is the intent to prohibit ESG funds being used to help victims of DV, if they are living with others? This seems drastically unfair. | <p>If 1 of the 2 conditions exists, the person more than likely is eligible for SER and must apply to DHS for assistance. If SER eligible, funding will come from DHS, if SER ineligible, by way of a denial letter, the person would be eligible for ESG.</p> |
| <p>19. Pages three and four – III Target Population - This program is targeted to individuals and families who “but for” this assistance will become or remain homeless. MSHDA is requiring file documentation to verify need, as defined on the Homeless Certification, Form No. 2, and At Risk of Homeless Certification, Form No. 3. The amount of funds that will be available to recipients will likely not be enough to serve all persons at risk of homelessness; therefore, communities must prioritize funding as follows:</p> <p>Rapid Re-housing (Homeless)</p> <ol style="list-style-type: none"> 1. Homeless Individual with a Disability, as defined by HUD. (See ESG Form Nos. 2 and 4) 2. Chronically Homeless (See ESG Form No. 2) 3. General Homeless (See ESG Form No. 2) <p>Prevention (At Risk of Homelessness)</p> <ol style="list-style-type: none"> 1. Those closest to going to a shelter, car, or the street. <p>Risk factors for those most in need would include:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Extremely low incomes; <input type="checkbox"/> Criminal histories; <input type="checkbox"/> Behavioral health issues; | <p>MSHDA will present methods used by Michigan communities to prioritize and assist the hardest to serve during webinars. The CoC should discuss how this will occur and have policy in place so that everyone is treated fairly.</p> |

| <p><input type="checkbox"/> Poor employment histories.</p> <p>Risk factors that make finding and maintaining housing more challenging should be used to screen people into assistance rather than screening them out.</p> <p>Could guidance please be provided on how to “prioritize” the different demographic groups? Aside from being community partners with agencies that serve these populations, and providing communication and education with them, I am not sure how to make these groups priorities without denying assistance to other individuals that would be eligible.</p> | |
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| OTHER COMMENTS | |
| <ul style="list-style-type: none"> • We support the requirement for habitability standards before prevention assistance is provided. In past experience with HPRP, program participants often received three months of assistance before an HQS inspection took place which often resulted in determining there were violations to habitability standards when a fourth month of financial assistance was requested. Because funding had already been provided to the landlord this lead to concerns and issues. (Pages 14 and 15) • Appreciate the development of Form No. 11 – Lease Approval. This insures the program participant and the potential/existing landlord are aware of the program and clearly delineates responsibilities as it insures that information about the unit and lease are provided. Thank you for clearly stating that the lease cannot be signed until the processes are completed as this often became a barrier in previous programs despite repeated attempts to communicate this information. (Page 14) • Appreciate the expanded details provided for Occupancy Standards outlined on Page 16, especially undersized and oversized units as this presented questions with HPRP in the past. (Page 16) • Support the use of a waiver of SER Denial Letter in situations where it is known the program participant would not be eligible to receive this service. This will be helpful in expediting financial assistance to those that qualify, as the SER Denial Letter will often delay the ability to process paperwork on behalf of the program participant. (Page 10) • Welcome and support the inclusion of security deposit and utility deposit to new voucher holders as long as other resources such as DHS have been explored. This was a needed component to insure long-term housing stability and self-sufficiency within our HPRP experience. (Page 8). • We support the requirement to meet with program participants monthly. While the Housing Resource Specialist would make every effort to reengage the program participant, if they did not comply with this requirement it will be helpful that assistance can be terminated if the program participant is not involved in this process. • After studying the proposal, we appreciate the opportunity to comment on the draft proposal. We appreciate that MSHDA recognizes the continued need for prevention assistance as well as rapid rehousing. Prevention activities should continue to | |

be supported as it is less traumatic for a household to maintain current housing when it can be affordable and there is less expense when compared to relocation and loss of belongings. While we understand HUD's focus on Rapid Rehousing, we appreciate some funding being allocated to this important area.

- We understand the necessity to prioritize those in need in consideration of limited funding and providing criteria to do so. We recognize that the funding will unfortunately not be enough to assist everyone in a housing crisis and appreciate that the risk factors included provide the ability to assist those with the most challenges during their crisis. (Re: Page 3)
- We appreciate the full 7% administrative costs associated with running a program such as this. A program such as this requires a great deal of expense and the inclusion of supplies and staff training. (Re: Page 4)